

# THE NAVAJO NATION



JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

December 6, 2020

Chairman Robert "Bob" Burns  
Commissioner Sandra Kennedy  
Commissioner Boyd Dunn  
Commissioner Justin Olson  
Commissioner Leah Marquez Peterson

**OPEN MEETING AGENDA ITEM**

Re: Tucson Electric Power Company Rate Case; Docket No. E-01933A-19-0028

Dear Commissioners,

The Navajo Nation looks forward to the possibility of intervening in the Tucson Electric Power ("TEP") rate case and adding to the record regarding Just Transition Funding if the Commission adopts Commissioner Sandra Kennedy's Amendment Number One. As I stated in my January 24 public comments in this Docket, and in oral public comments, the Nation suffers significant financial harm from the shuttering of coal plants in Arizona. The transition away from coal is not going to be an easy one, but the Nation stands ready to partner with Arizona utilities and ratepayers to make this transition in a way that benefits the entire state.

My public comments in this Docket quantified approximately \$61.8 million in Just Transition funding associated with TEP's provision of service. The calculation utilized the same methodology as appears in my testimony in the pending APS rate case E-01345A-19-0236.

The Nation asks the Commission to provide Just Transition funding in the TEP rate case and appreciates that the proposed Kennedy Amendment will create additional opportunity for the Commission to gather the evidence and to consider the need for a Just Transition related to the closure of coal-fired power plants. Commissioner Kennedy's Amendment offers a much more efficient option for the consideration of Just Transition than a future, generic proceeding in isolation from rate cases might offer. Each utility has unique cost of service and rate design issues that should be considered in the adoption of Just Transition funding; a one-size-fits-all generic proceeding cannot address these unique considerations as well as each utility's rate case can. Commissioner Kennedy's Amendment appears to use a generic docket for common issues but continues to use utility-specific rate cases for implementation. This seems a sensible solution.

Thank you for your attention to this matter. The Nation looks forward to continuing its efforts before the Commission as we seek a Just Transition for coal communities in Arizona.

Sincerely,

A handwritten signature in black ink, appearing to read "J-Nez".

Jonathan Nez, President

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